



EEB

European  
Environmental  
Bureau

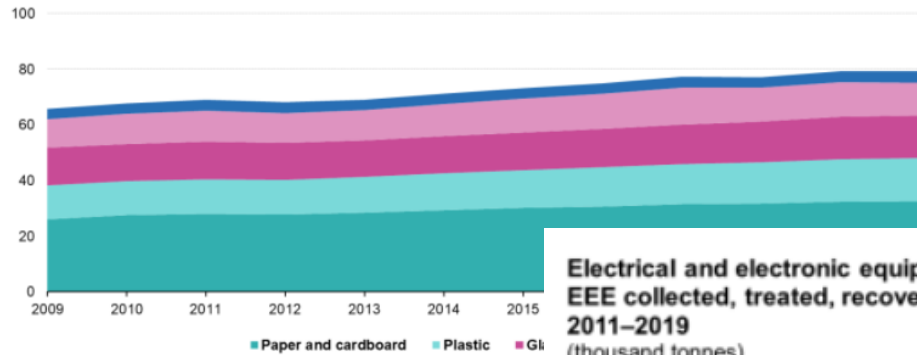
**EPR as a driver for sustainable consumption – 16<sup>th</sup> November 2022**





# Overall waste and resource use

**Packaging waste generated by packaging material, EU, 2009–2020**  
(million tonnes)



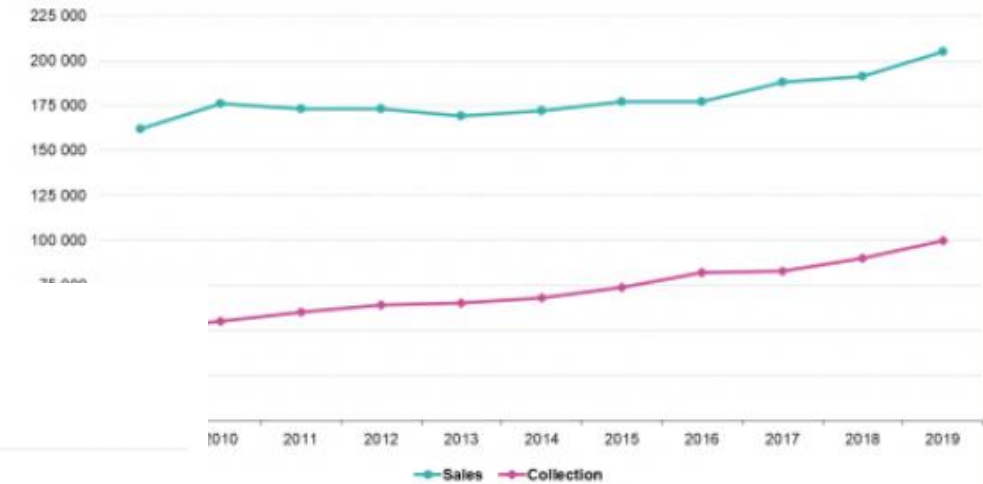
Note: Eurostat estimates between 2009 and 2011, 2020.  
Source: Eurostat (online data code: env\_waspac)

**Electrical and electronic equipment (EEE) put on the market and waste EEE collected, treated, recovered, recycled and prepared for reuse, EU, 2011–2019**  
(thousand tonnes)



Note: 2019 data, as well as 2018 data for put on the market and 2011 data for reused and recycled EEE waste: Eurostat estimates  
Source: Eurostat (online data code: env\_waseleees and env\_waselee)

**Sales and collection of portable batteries and accumulators, EU, 2009–2019**  
(tonnes)



between 2009 and 2014 and in 2019  
data code: env\_waspb)

eurostat



# Labelling



FR

Cet appareil  
se recycle

À DÉPOSER  
EN MAGASIN



OU

À DÉPOSER  
EN DÉCHÈTERIE



Points de collecte sur [www.quefairedemesdechets.fr](http://www.quefairedemesdechets.fr)  
Privilégiez la réparation ou le don de votre appareil !



FR



ÉTUI

TUBE





# EPR and price

## EPR fee to product cost ratio

*For WEEE, batteries, and textiles, EPR fees are minuscule compared to product price, so they don't have a significant impact on producers' product design decisions.*





# Visible fee?

## Advantages of the visible environmental fee



### **Environment**

A visible environmental fee, indicating the collection and recycling costs, ensures that economical and cost related elements are not the sole driving factors in the management of the waste batteries.



### **Consumers**

Invoice the net costs related to the collection and recycling of the waste batteries separately, without a profit margin of the different steps in the distribution chain.



### **Authorities**

A visible fee on the invoices of the economical actors simplifies the market surveillance activities.



### **Economic actors**

The visible fee limits the impact on existing commercial relations between economical actors involved in the distribution of new batteries.

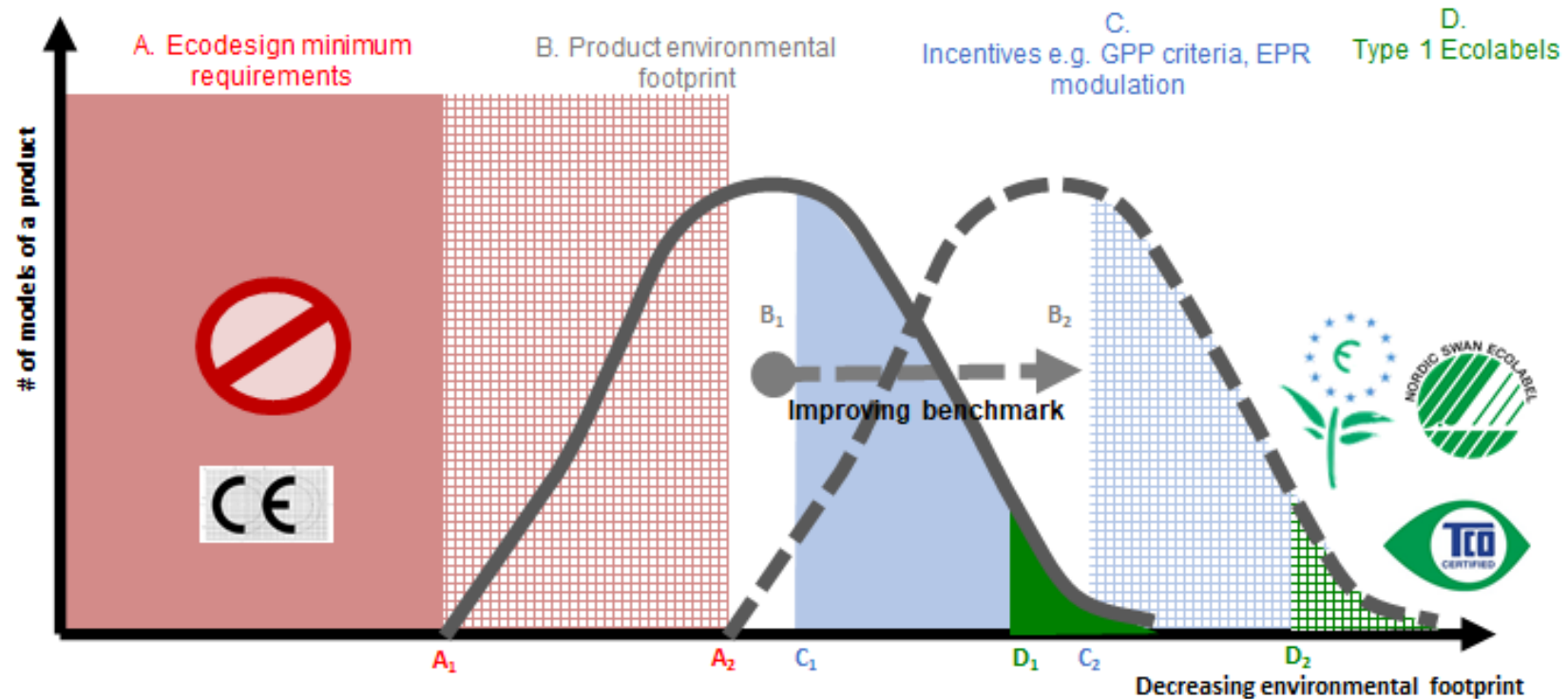


# EU EPR: cost coverage

- EU WFD and SUPD determine scope of cost coverage for EPR schemes
- Article 8(4) WFD – costs include: separate collection, treatment, including treatment necessary to meet other objectives, information, and data collection.
- Article 8(2) SUPD – costs include collection, waste management, awareness raising, clean up of marine litter.

*Key question: should the scope of cost coverage be expanded to include further life cycle impacts (including societal costs).*

# EPR as part of a policy mix



Ecodesign addresses supply removing 'unsustainable products'

PEF identifies benchmark or average performance on the market

Incentives pull the market beyond better than average performance

Endorsement labels clearly identify top 10% performance



# EPR & new business models?

EVERLANE  
ReNew



Easy to  
throw out.



Better to  
throw on.



**Towards a policy framework that enables efficient waste collection, closed loop recycling and access to recycled content**

The EU Circular Economy Action Plan has the ambition of accelerating the transition to a circular economy. This will require significant changes in the way we collect, reuse, recycle and incorporate recycled materials. The objective we should aspire to is achieving fully closed and resource efficient waste management systems for all materials. Indeed, the more closed-loop a system is, the more resource efficient it will be by delivering quality recycled materials which can be re-used multiple times for the same application. Therefore, **for each sector, the ultimate goal should be to achieve “closed loop recycling”<sup>1</sup>. With the right enabling policy framework this can be**





# EPR & new business models?



**Déprogrammons  
l'obsolescence.**

Des produits durables, reconditionnés par des experts.

**BackMarket**

backmarket.fr



# Fonds pour le Réemploi Solidaire

- Introduced via the French Circular Economy Law (AGEC)
- Solidarity Reuse Fund will “ earmark ” 5% of EPR revenues for reuse activities
- Estimated total fund 50 million EUR
- Supported by other measures such as ban on the destruction of unsold goods

*Key question: how transparent is the use of EPR revenues and investments - does it make sense to earmark them?*



# Online markets places

*“Available information indicates that EPR fees are currently unpaid for around 5-10% of the value of the EEE placed on the market in OECD countries. The problem is unlikely to go away – opportunities for free-riding will only increase with continued growth of online sales.” OECD, 2018*



# Zentrale Stelle Verpackungsregister (ZSVR)

- German platform launched in July 2022 to address free riding in EPR
- LUCID packaging registry provides a database for companies to register their compliance
- Online marketplaces are obliged to check whether vendors are complying with their obligations
- Take-away restaurants are also responsible for registering
- 635,000 registrations (including 185,000 from China)



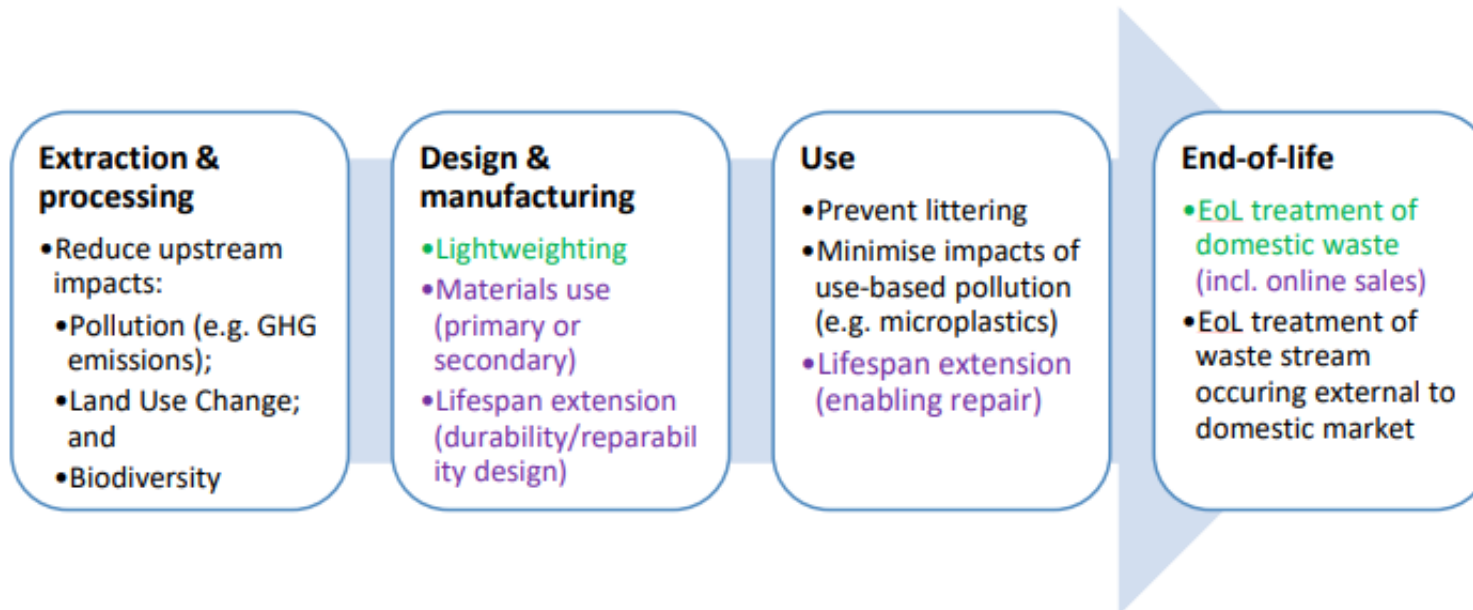
# Policy opportunities

- **Saving resources and environmental footprint** – the overall objective of EPR should shift from collecting waste towards reducing the overall footprint from high impact sectors
- **Policy mix** – EPR cannot work alone and should be designed with other measures, including forthcoming ecodesign requirements
- **Enabling new business models** – EPR should prioritise waste prevention and value retention – access to materials should be prioritized for actors who will make best use of it.
- **Information** – B2C labelling should enable consumers to manage their waste effectively rather than confuse them. Harmonisation could aid manufacturers.
- **Costs** - greater scope on cost coverage and a visible fee could influence purchasing decisions (and therefore design). Though now the impact on price is limited.
- **Online platforms** – free-riding should be addressed, and platforms should take greater responsibility, given their hegemonic responsibility in putting products on the market
- **Revenues** – greater transparency may be needed on how EPR revenues are used, earmarking investments towards



# EPR and product life cycle

Figure 4.1. Possible objectives of EPR to reduce environmental impacts throughout a product's lifecycle



Note: **Green** marks the actions traditionally covered by an EPR. **Purple** marks the actions that are currently explored or implemented in some EPR systems for some product categories. **Black** mark actions to avoid other impact categories that are currently not considered in EPR systems.

Source: Authors own.



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**Thanks for listening!**

**Keep in touch**



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